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13 *Attorney for Plaintiff, Wells Fargo Bank, N.A., As Trustee For The Certificate Holders Of Park*
14 *Place Securities, Inc., Asset-Backed Pass-Through Certificates, Series 2005-WCW1*

10 **UNITED STATES DISTRICT COURT**
11 **DISTRICT OF NEVADA**

12 WELLS FARGO BANK, N.A., AS
13 TRUSTEE FOR THE CERTIFICATE
14 HOLDERS OF PARK PLACE SECURITIES,
15 INC., ASSET-BACKED PASS-THROUGH
16 CERTIFICATES, SERIES 2005-WCW1,

17 Plaintiff,

18 vs.

19 COMMONWEALTH LAND TITLE
INSURANCE COMPANY,

Defendant.

Case No.: 2:19-cv-00803-GMN-EJY

**STIPULATION TO EXTEND TIME TO
RESPOND TO MOTION TO DISMISS
[ECF NO. 46]**

(Second Request)

20 COMES NOW, Plaintiff, Wells Fargo Bank, N.A., as Trustee for the Certificate Holders
21 of Park Place Securities, Inc., Asset-Backed Pass-Through Certificates, Series 2005-WCW1
22 (“Plaintiff”) and Defendant, Commonwealth Land Title Insurance Company (“Commonwealth”),
23 by and through their respective undersigned counsels, stipulate and agree as follows:

- 24 1. On March 12, 2024, Commonwealth filed a Motion to Dismiss [ECF No. 46];
- 25 2. Plaintiff’s deadline to respond to Commonwealth’s Motion to Dismiss is currently
26 April 9, 2024 following an initial extension granted by this Court [ECF No. 50];
- 27 3. Since the initial extension, on April 4, 2024, the Ninth Circuit Court of Appeals issued
28 a memorandum decision in *Wells Fargo Bank, N.A. v. Commonwealth Land Title*

1 Insurance Company, Ninth Cir. Case No. 19-16181 (District Court Case No. 2:18-
2 CV-00494-APG-BNW) (“Wells Fargo”). Plaintiff requires additional time to assess
3 any potential impact of Wells Fargo on this matter;

- 4 4. Accordingly, good cause exists to grant a one-week extension up to and including
5 April 16, 2024 for Plaintiff to file its response to Commonwealth’s Motion to Dismiss;
6 5. Counsel for Commonwealth does not oppose the requested extension;
7 6. This is the second request for an extension and is made in good faith and not for
8 purposes of undue delay or prejudice.

9 **IT IS SO STIPULATED.**

10 DATED this 9th day of April, 2024.

DATED this 9th day of April, 2024.

11 WRIGHT, FINLAY & ZAK, LLP

SINCLAIR BRAUN KARGHER LLP

12 /s/ Yanxiong Li, Esq.

/s/ Kevin S. Sinclair, Esq.

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18 N.A., As Trustee For The Certificate Holders

Land Title Insurance Company

19 Of Park Place Securities, Inc., Asset-Backed

20 Pass-Through Certificates, Series 2005-

WCW1

21 **IT IS SO ORDERED.**

22 DATED: April 9, 2024

23 
DISTRICT COURT JUDGE